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Hornell Brewing Co., Inc., Beverage Marketing USA, Inc.,
Beverage Marketing USA, Inc., Arizona Beverages Holdings
LLC and Arizona Beverages Holdings 2 LLC*

THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AHMED ASHOUR, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

ARIZONA BEVERAGES USA LLC,
HORNELL BREWING CO., INC.,
BEVERAGE MARKETING USA, INC.,
ARIZONA BEVERAGES HOLDINGS LLC,
and ARIZONA BEVERAGES HOLDINGS 2
LLC,

Defendants.

Case No. 1:19-cv-07081(AT)(OTW)

DEFENDANTS' INITIAL REQUEST
FOR ADMISSIONS TO PLAINTIFF

TO: Carlos F. Ramirez, Esq.
Reese LLP
100 West 93rd Street, 16th Floor
New York, New York 10025
Attorneys for Plaintiff, Ahmed Ashour

PLEASE TAKE NOTICE that Defendants, Arizona Beverages USA LLC, Hornell
Brewing Co., Inc., Beverage Marketing USA, Inc., Arizona Beverages Holdings LLC and

Arizona Beverages Holdings 2 LLC (“Defendants”), pursuant to Rule 36 of the Federal Rules of Civil Procedure, hereby demand that Plaintiff, Ahmed Ashour (“Plaintiff”), respond to the following requests for admissions within the time and in the manner prescribed by Rule 36 by admitting or denying the statements set forth in the “Requests” below.

Dated: June 9, 2020

By: 

ROBERT P. DONOVAN

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*Attorneys for Defendants, Arizona
Beverages USA LLC, Hornell Brewing Co.,
Inc., Beverage Marketing USA, Inc., Arizona
Beverages Holdings LLC, and Arizona
Beverages Holdings 2 LLC*

DEFINITIONS

1. “Complaint” means the First Amended Class Action Complaint filed by Plaintiff in the above-captioned lawsuit on September 24, 2019 (Doc. 42).

2. “Arizona Beverage” and/or “Arizona Beverages” means any of the “Arizona” brand beverages which are the subject of Plaintiffs’ Complaint as referred to in paragraphs 2 and 41 of the Complaint.

3. “You,” “your,” and/or “Plaintiff” means Plaintiff, Ahmed Ashour, as that individual identified in paragraph 14 of the Complaint.

REQUESTS

1. Admit or deny Plaintiff purchased an Arizona Iced Tea with Lemon Flavor between May 14, 2013 and May 14, 2019.

Response:

2. Admit or deny Plaintiff did not purchase an Arizona Iced Tea with Lemon Flavor between May 14, 2013 and May 14, 2019.

Response:

3. Admit or deny Plaintiff purchased an Arizona Green Tea with Ginseng and Honey between May 14, 2013 and May 14, 2019.

Response:

4. Admit or deny Plaintiff did not purchase an Arizona Green Tea with Ginseng and Honey between May 14, 2013 and May 14, 2019.

Response:

5. Admit or deny Plaintiff purchased an Arizona Arnold Palmer Lite Half Iced Tea Half, Lemonade between May 14, 2013 and May 14, 2019.

Response:

6. Admit or deny Plaintiff did not purchase an Arizona Arnold Palmer Lite Half Iced Tea, Half Lemonade between May 14, 2013 and May 14, 2019.

Response:

7. Admit or deny Plaintiff purchased an Arizona Zero Calorie Iced Tea with Peach Flavor between May 14, 2013 and May 14, 2019.

Response:

8. Admit or deny Plaintiff did not purchase an Arizona Zero Calorie Iced Tea with Peach Flavor between May 14, 2013 and May 14, 2019.

Response:

9. Admit or deny Plaintiff purchased an Arizona Grapeade between May 14, 2013 and May 14, 2019.

Response:

10. Admit or deny Plaintiff did not purchase an Arizona Grapeade between May 14, 2013 and May 14, 2019.

Response:

11. Admit or deny Plaintiff purchased an Arizona Iced Tea with Raspberry Flavor between May 14, 2013 and May 14, 2019.

Response:

12. Admit or deny Plaintiff did not purchase an Arizona Iced Tea with Raspberry Flavor between May 14, 2013 and May 14, 2019.

Response:

13. Admit or deny Plaintiff purchased an Arizona Southern Style Real Brewed Sweet Tea between May 14, 2013 and May 14, 2019.

Response:

14. Admit or deny Plaintiff did not purchase an Arizona Southern Style Real Brewed Sweet Tea between May 14, 2013 and May 14, 2019.

Response:

15. Admit or deny Plaintiff purchased an Arizona Arnold Palmer Zero-Half Iced Tea, Half Lemonade between May 14, 2013 and May 14, 2019.

Response:

16. Admit or deny Plaintiff did not purchase an Arizona Arnold Palmer Zero-Half Iced Tea, Half Lemonade between May 14, 2013 and May 14, 2019.

Response:

17. Admit or deny Plaintiff purchased an Arizona Golden Bear Lemonade Iced Tea Lite (Strawberry) between May 14, 2013 and May 14, 2019.

Response:

18. Admit or deny Plaintiff did not purchase an Arizona Golden Bear Lemonade Lite (Strawberry) Iced Tea between May 14, 2013 and May 14, 2019.

Response:

19. Admit or deny Plaintiff purchased an Arizona Decaf-Zero Green Tea With Ginseng between May 14, 2013 and May 14, 2019.

Response:

20. Admit or deny Plaintiff did not purchase an Arizona Decaf Zero-Green Tea With Ginseng between May 14, 2013 and May 14, 2019.

Response:

21. Admit or deny Plaintiff purchased an Arizona Kiwi Strawberry Fruit Juice between May 14, 2013 and May 14, 2019.

Response:

22. Admit or deny Plaintiff did not purchase an Arizona Kiwi Strawberry Fruit Juice between May 14, 2013 and May 14, 2019.

Response:

23. Admit or deny Plaintiff purchased an Arizona Watermelon Fruit Juice between May 14, 2013 and May 14, 2019.

Response:

24. Admit or deny Plaintiff did not purchase an Arizona Watermelon Fruit Juice between May 14, 2013 and May 14, 2019.

Response:

25. Admit or deny Plaintiff purchased an Arizona Fruit Punch Fruit Juice between May 14, 2013 and May 14, 2019.

Response:

26. Admit or deny Plaintiff did not purchase an Arizona Fruit Punch Fruit Juice between May 14, 2013 and May 14, 2019.

Response:

27. Admit or deny Plaintiff purchased an Arizona Mucho Mango Juice between May 14, 2013 and May 14, 2019.

Response:

28. Admit or deny Plaintiff did not purchase an Arizona Mucho Mango Juice between May 14, 2013 and May 14, 2019.

Response:

29. Admit or deny Plaintiff purchased an Arizona Rx Energy Herbal Tonic between May 14, 2013 and May 14, 2019.

Response:

30. Admit or deny Plaintiff did not purchase an Arizona Rx Energy Herbal Tonic between May 14, 2013 and May 14, 2019.

Response:

31. Admit or deny Plaintiff purchased an Arizona Green Tea With Ginseng between May 14, 2013 and May 14, 2019.

Response:

32. Admit or deny Plaintiff did not purchase an Arizona Green Tea With Ginseng between May 14, 2013 and May 14, 2019.

Response:

33. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the flavor of that product.

Response:

34. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of the flavor of that product.

Response:

35. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the taste of that product.

Response:

36. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of the taste of that product.

Response:

37. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the price of that product.

Response:

38. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of the price of that product.

Response:

39. Admit or deny Plaintiff purchased an Arizona Beverage in part because of familiarity with that product.

Response:

40. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of familiarity with that product.

Response:

41. Admit or deny Plaintiff purchased an Arizona Beverage in part to quench his thirst.

Response:

42. Admit or deny Plaintiff did not purchase an Arizona Beverage in part to quench his thirst.

Response:

43. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the quantity contained in the bottle and/or can.

Response:

44. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of the quantity contained in the bottle and/or can.

Response:

45. Admit or deny Plaintiff purchased an Arizona Beverage in part because the product was not a carbonated beverage.

Response:

46. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because the product lacked carbonation.

Response:

47. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the calories contained in the product.

Response:

48. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of the calories contained in the product.

Response:

49. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the ingredients contained in the product.

Response:

50. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of the ingredients contained in the product.

Response:

51. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the lack of sugar content.

Response:

52. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because the lack of sugar content.

Response:

53. Admit or deny that each time Plaintiff purchased an Arizona Beverage he read the statement of ingredients on the label on that product prior to every purchase.

Response:

54. Admit or deny Plaintiff did not read the statement of ingredients on the label on that product prior to every purchase.

Response:

55. Admit or deny Plaintiff purchased an Arizona Beverage in part because of the brand name.

Response:

56. Admit or deny Plaintiff did not purchase an Arizona Beverage in part because of the brand name.

Response:

57. Admit or deny that, at the time of his purchases of Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff believed citric acid may be a preservative.

Response:

58. Admit or deny that, at the time of his purchases of Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff believed that citric acid may not be a preservative.

Response:

59. Admit or deny that, at the time of his purchases of Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff believed that the citric acid in an Arizona Beverage was a preservative.

Response:

60. Admit or deny that, at the time of his purchases of Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff did not believe that the citric acid in an Arizona Beverage was a preservative.

Response:

61. Admit or deny that, at the time of his purchases of Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff believed that consuming a preservative was harmful to his health.

Response:

62. Admit or deny that, at the time of his purchases of Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff did not believe that consuming a preservative was harmful to his health.

Response:

63. Admit or deny that Plaintiff purchased and consumed products containing citric acid since May 14, 2019.

Response:

64. Admit or deny that Plaintiff has not purchased and consumed products containing citric acid since May 14, 2019.

Response:

65. Admit or deny that Plaintiff purchased and consumed an orange since May 14, 2019.

Response:

66. Admit or deny that Plaintiff purchased and consumed a lemon since May 14, 2019.

Response:

67. Admit or deny that Plaintiff purchased and consumed a lime since May 14, 2019.

Response:

68. Admit or deny that Plaintiff purchased and consumed a pineapple since May 14, 2019.

Response:

69. Admit or deny that Plaintiff purchased and consumed a grapefruit since May 14, 2019.

Response:

70. Admit or deny that Plaintiff purchased and consumed orange juice since May 14, 2019.

Response:

71. Admit or deny that Plaintiff purchased and consumed grapefruit juice since May 14, 2019.

Response:

72. Admit or deny that Plaintiff purchased and consumed a tomato since May 14, 2019.

Response:

73. Admit or deny that Plaintiff purchased and consumed wine since May 14, 2019.

Response:

74. Admit or deny that Plaintiff purchased the Arizona Green Tea with Ginseng and Honey, referenced in paragraph 41 of the Complaint, in part because the product contained ginseng.

Response:

75. Admit or deny that Plaintiff did not purchase the Arizona Green Tea With Ginseng and Honey, referenced in paragraph 41 of the Complaint, in part because the product contained ginseng.

Response:

76. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff knew that citric acid was an ingredient in the products purchased.

Response:

77. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff did not know that citric acid was an ingredient in the products purchased.

Response:

78. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff knew that the products purchased contained high fructose corn syrup.

Response:

79. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff did not know that the products purchased contained high fructose corn syrup.

Response:

80. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff knew that the products purchased contained calories.

Response:

81. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff did not know that the products purchased contained calories.

Response:

82. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff did not have any concern about the ingredients in the products purchased.

Response:

83. Admit or deny that prior to each of the purchases alleged at paragraph 41 of the Complaint, Plaintiff did have a concern about the ingredients in the products purchased.

Response:

84. Admit or deny that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "A".

Response:

85. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit "A".

Response:

86. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "B".

Response:

87. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit "B".

Response:

88. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "C".

Response:

89. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit "C".

Response:

90. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "D".

Response:

91. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit "D".

Response:

92. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "E".

Response:

93. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit “E”.

Response:

94. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit “F”.

Response:

95. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit “F”.

Response:

96. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit “G”.

Response:

97. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit “G”.

Response:

98. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "H".

Response:

99. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit "H".

Response:

100. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "I".

Response:

101. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit "I".

Response:

102. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit "J".

Response:

103. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit "J".

Response:

104. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit “K”.

Response:

105. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit “K”.

Response:

106. Admit or deny that that since May 14, 2013, Plaintiff purchased a product bearing a label annexed hereto as Exhibit “L”.

Response:

107. Admit or deny that that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit “L”.

Response:

108. Admit or deny that since May 14, 2013, Plaintiff never purchased a product bearing a label annexed hereto as Exhibit “M”.

Response:

109. Admit or deny that Plaintiff formed a belief that citric acid was a preservative before the purchases alleged in paragraph 41 of the Complaint.

Response:

110. Admit or deny that Plaintiff had not formed a belief that citric acid was a preservative before the purchases alleged in paragraph 41 of the Complaint.

Response:

111. Admit or deny that the Putative Class includes every single resident in the United States who purchased, within the six-year period immediately preceding May 14, 2019, any Arizona Beverage in the United States for the same reason(s) Plaintiff made each purchase.

Response:

112. Admit or deny that the Putative Class includes every single resident in the State of California who purchased, within the six-year period immediately preceding May 14, 2019, any Arizona Beverage in the State of California for the same reason(s) Plaintiff made each purchase.

Response:

113. Admit or deny that Plaintiff purchased more than 10 items of Arizona Beverages during the six-year period immediately preceding May 14, 2019.

Response:

114. Admit or deny that Plaintiff purchased more than 20 items of Arizona Beverages during the six-year period immediately preceding May 14, 2019.

Response:

115. Admit or deny that Plaintiff purchased more than 50 items of Arizona Beverages during the six-year period immediately preceding May 14, 2019.

Response:

116. Admit or deny that prior to May 14, 2019, Plaintiff purchased Arizona Beverages.

Response:

117. Admit or deny that after May 14, 2019, Plaintiff purchased an Arizona Beverage.

Response:

118. Admit or deny that after May 14, 2019, Plaintiff did not purchase an Arizona Beverage.

Response:

119. Admit or deny that Plaintiff will purchase an Arizona Beverage again.

Response:

120. Admit or deny that Plaintiff will not purchase an Arizona Beverage again.

Response:

121. Admit or deny that Plaintiff purchased an Arizona Beverage for one reason.

Response:

122. Admit or deny that Plaintiff purchased an Arizona Beverage for more than one reason.

Response:

123. Admit or deny that Plaintiff is unaware of all the reasons why other people purchase Arizona Beverages.

Response:

124. Admit or deny that Plaintiff is aware of all the reasons why other people purchase Arizona Beverages.

Response:

125. Admit or deny that Plaintiff is obligated to pay all reasonable and necessary expenses he incurs in this litigation.

Response:

126. Admit or deny that, other than the Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff has purchased other items of food and/or beverage which contain citric acid.

Response:

127. Admit or deny that, other than the Arizona Beverages referenced in paragraph 41 of the Complaint, Plaintiff has never purchased other items of food and/or beverage which contain citric acid.

Response:

128. Admit or deny that, after May 14, 2019, Plaintiff has purchased food and/or beverages labeled as having “no preservatives.”

Response:

129. Admit or deny that, after May 14, 2019, Plaintiff has not purchased food and/or beverages labeled as having “no preservatives.”

Response:

130. Admit or deny that each time he purchased an Arizona Beverage, Plaintiff personally consumed same.

Response:

131. Admit or deny that Plaintiff purchased an Arizona Beverage in part because that product was labeled “No Preservatives.”

Response:

132. Admit or deny that Plaintiff purchased an Arizona Beverage solely because that product was labeled “No Preservatives.”

Response:

133. Admit or deny that Plaintiff purchased the Arizona Rx Energy Herbal Tonic, referenced in paragraph 41 of the Complaint, in part because that product contained caffeine.

Response:

134. Admit or deny that Plaintiff did not purchase an Arizona Rx Energy Herbal Tonic, referenced in paragraph 41 of the Complaint, in part because that product contained caffeine.

Response:

135. Admit or deny that Plaintiff purchased a Lipton Iced Tea beverage since May 14, 2013.

Response:

136. Admit or deny that Plaintiff did not purchase a Lipton Iced Tea beverage since May 14, 2013.

Response:

137. Admit or deny that Plaintiff purchased a Twinings Iced Tea beverage since May 14, 2013.

Response:

138. Admit or deny that Plaintiff did not purchase a Twinings Iced Tea beverage since May 14, 2013.

Response:

139. Admit or deny that Plaintiff purchased a Nestea Iced Tea beverage since May 14, 2013.

Response:

140. Admit or deny that Plaintiff did not purchase a Nestea Iced Tea beverage since May 14, 2013.

Response:

141. Admit or deny that Plaintiff purchased a Snapple Iced Tea beverage since May 14, 2013.

Response:

142. Admit or deny that Plaintiff did not purchase a Snapple Iced Tea beverage since May 14, 2013.

Response:

143. Admit or deny that Plaintiff purchased a Gold Peak Iced Tea beverage since May 14, 2013.

Response:

144. Admit or deny that Plaintiff did not purchase a Gold Peak Iced Tea beverage since May 14, 2013.

Response:

145. Admit or deny that Plaintiff purchased a Pure Leaf Lemon Iced Tea beverage since May 14, 2013.

Response:

146. Admit or deny that Plaintiff did not purchase a Pure Leaf Lemon Iced Tea beverage since May 14, 2013.

Response:

147. Admit or deny that Plaintiff purchased a Pure Leaf Unsweetened Black Tea beverage since May 14, 2013.

Response:

148. Admit or deny that Plaintiff did not purchase a Pure Leaf Unsweetened Black Tea beverage since May 14, 2013.

Response:

CERTIFICATION

I certify that a copy of Defendants' Initial Request for Admissions to Plaintiff was served this day, via email and Federal Express overnight delivery, upon Carlos F. Ramirez, Esq., Reese LLP, 100 West 93rd Street, 16th Floor, New York, New York 10025, attorneys for Plaintiff.

Dated: June 9, 2020

By: _____


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*Attorneys for Defendants, Arizona
Beverages USA LLC, Hornell Brewing Co.,
Inc., Beverage Marketing USA, Inc., Arizona
Beverages Holdings LLC, and Arizona
Beverages Holdings 2 LLC*

EXHIBIT A



Arizona AN AMERICAN COMPANY

Green Tea with GINSENG and HONEY

緑茶

Arizona GREEN TEA with GINSENG and HONEY

11.5 FL. OZ. - 340 mL

Enjoy America's best selling ready-to-drink green tea! Arizona Green Tea... offers great taste and goodness. "naturally" and "naturally" Green Tea for the health benefits. Ginseng for energy and nature's natural sweetness, honey.

100% NATURAL

NO PRESERVATIVES, ARTIFICIAL COLOR, ARTIFICIAL FLAVOR

Great Taste!

SHAKE WELL

REFRIGERATE AFTER OPENING

Nutrition Facts

Serving Size 1 Can

Amount Per Serving

Calories 100 Calories from Fat 0

% Daily Value*

Total Fat	0g	0%
Saturated Fat	0g	0%
Trans Fat	0g	0%
Cholesterol	0mg	0%
Sodium	10mg	0%
Total Carbohydrate	25g	0%
Dietary Fiber	0g	0%
Sugars	24g	0%
Protein	0g	0%
Vitamin A	0%	0%
Vitamin C	25%	0%
Calcium	0%	0%
Hot	0%	0%

*Percent Daily Values are based on a diet of other people's secrets.

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EXHIBIT B

12HE02-3611 ©

綠茶

Arizona
Green Tea

100% NATURAL

NO
PRESERVATIVES
ARTIFICIAL COLOR
ARTIFICIAL FLAVOR



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6 13008 73849 5

SueBee
Orangetan
Orange Honey

INGREDIENTS: PREMIUM BREWED GREEN TEA USING FILTERED WATER, HIGH
FRUCTOSE CORN SYRUP (GLUCOSE-FRUCTOSE SYRUP), HONEY, ASCORBIC
ACID (VITAMIN C), CITRIC ACID, NATURAL FLAVOR, GINSENG EXTRACT,
MFD. FOR ARIZONA BEVERAGES USA LLC., WOODBURY, NY 11797 USA
© 2018 BEVERAGE MARKETING USA, INC.

Nutrition Facts

Serving Size 8 fl. oz. (240mL)
 Servings Per Container Approx. 1.5

Answer for Section

Calories 70 **Calories from Fat 0**

% Daily Values*

Total Fat 0g

Saturated Fat	0g	0%
---------------	----	----

Trans Fat Og

Cholesterol Drug 0%

Sodium 10mg 0%

Total Carbon yield 179 6%

Dietary Fiber 0g

Sugars 17g

Protein	0%
---------	----

Vitamin A 0% • Vitamin C 100%

Calcium 0% • Iron 0%

*Percent Daily Values are based on a diet of other people's secrets.

2,000 calorie diet

**SHAKE WELL
DIGEST AFTER 10 MIN.**

REFRIGERATE AFTER OPENING

CA GRV HILL-6-00000000

For more information about AnZona call 1 800 832 3775

EXHIBIT C

Arizona AN AMERICAN COMPANY

Green Tea with GINSENG and HONEY

15.5 FL. OZ. = 458 mL @

緑茶

Arizona
Green Tea
with GINSENG and HONEY
100% NATURAL
Enjoy America's best selling
ready-to-drink green tea!
Arizona Green Tea... Where great
taste and goodness
"naturally" come together.
Green tea for its health benefits,
Ginseng for energy and nature's
natural sweetener, honey.

INGREDIENTS: PREMIUM BREWED GREEN TEA USING FILTERED WATER, HIGH FRUCTOSE CORN SYRUP (GLUCOSE-FRUCTOSE SYRUP), HONEY, CITRIC ACID, NATURAL FLAVORS, ASCORBIC ACID (VITAMIN C), GINSENG EXTRACT.
MFD. FOR ARIZONA BEVERAGES USA LLC WOODBURY, NY 11797 USA
© 2018 BEVERAGE MARKETING USA, INC.

NO PRESERVATIVES
ARTIFICIAL COLOR
ARTIFICIAL FLAVOR

Great Hot!

Suebee,
Arizona
Orange Honey

Nutrition Facts
Serving Size 8 fl. oz. (240mL)
Servings Per Container Approx. 2

Amount Per Serving	Calories 70	Calories from Fat 0
Total Fat 0g		% Daily Value*
Saturated Fat 0g		0%
Trans Fat 0g		0%
Cholesterol 0mg		0%
Sodium 10mg		0%
Total Carbohydrate 17g		6%
Dietary Fiber 0g		0%
Sugars 17g		0%
Protein 0g		0%
Vitamin A 0%		Vitamin C 25%
Calcium 0%		Iron 0%

*Percent Daily Values are based on a diet of other people's secret recipes.
calorie, 0g.

For more information
about Arizona call
1-800-632-3773
drinkarizona.com

SHAKE WELL • REFRIGERATE AFTER OPENING

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EXHIBIT D

drinkarizona.com



For more information about AriZona call 1 800 832 3775

AriZona

Green Tea
with GINSENG
and HONEY

16 FL OZ - 473 mL

綠茶

AriZona

NO
PRESERVATIVES
ARTIFICIAL COLOR
ARTIFICIAL FLAVOR

Green Tea
with GINSENG
and HONEY
100%
NATURAL



SHAKE WELL
REFRIGERATE AFTER OPENING

CA CRV 11-11-14-08 106 DEP.

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INGREDIENTS: PREMIUM BREWED GREEN TEA USING FILTERED WATER, HIGH FRUCTOSE CORN SYRUP (GLUCOSE-FRUCTOSE SYRUP), HONEY, ASCORBIC ACID (VITAMIN C), CITRIC ACID, NATURAL FLAVOR, GINSENG EXTRACT.
MANUFACTURED FOR ARIZONA BEVERAGES USA LLC WOODBURY, NY 11797 USA,
© 2019 BEVERAGE MARKETING USA, INC.

Nutrition Facts

Serving Size 8 fl. oz. (240mL)
Servings Per Container 2

Amount Per Serving	
Calories 70	Calories from Fat 0
% Daily Value*	
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	0%
Cholesterol 0mg	0%
Sodium 10mg	0%
Total Carbohydrate 17g	6%
Dietary Fiber 0g	0%
Sugars 17g	0%
Protein 0g	0%
Vitamin A 0%	Vitamin C 100%
Calcium 0%	Iron 0%

*Percent Daily Values are based on a diet of other people's secrets.

drinkarizona.com



For more information about AriZona call 1 800 832 3775

EXHIBIT E



AriZona uses new tinted bottles to protect the natural antioxidant properties of our beverages from light. Here's to your health!

AriZona

AN AMERICAN COMPANY

Green Tea
with GINSENG
and HONEY

20 FL OZ. - 591 mL

綠茶

AriZona
Green Tea
100%
NATURAL

AriZona



CA ENV. H. 116 50 DEB.



SueBee
Orange Blossom

INGREDIENTS: PREMIUM BREWED GREEN TEA USING FILTERED WATER, HIGH FRUCTOSE CORN SYRUP (GLUCOSE-FRUCTOSE SYRUP), HONEY, ASCORBIC ACID (VITAMIN C), CITRIC ACID, NATURAL FLAVOR, GINSENG EXTRACT.

MANUFACTURED FOR ARIZONA BEVERAGES USA LLC
WOODBURY, NY 11767 USA © 2017 BEVERAGE MARKETING USA, INC.

Nutrition Facts

Serving Size 8 fl. oz. (240 mL)
Serving Size 20 fl. oz. (600 mL)

Amount Per Serving

Calories 70 Calories from Fat 0

Total Fat 1g 0%

Saturated Fat 0g 0%

Trans Fat 0g 0%

Cholesterol 0mg 0%

Sodium 10mg 0%

Total Carbohydrate 17g 6%

Dietary Fiber 0g 0%

Sugars 17g 0%

Protein 0g 0%

Vitamin A 0% Vitamin C 100%

Calcium 0% Iron 0%

Percent Daily Values are based on a diet of other people's secrets.

NO PRESERVATIVES
ARTIFICIAL COLOR
ARTIFICIAL FLAVOR

SHAKE WELL • REFRIGERATE AFTER OPENING



6 13008 75115 9



AriZona uses new tinted bottles to protect the natural antioxidant properties of our beverages from light. Here's to your health!

For more info about AriZona call 1 800 832 3775 drinkarizona.com

EXHIBIT F

Arizona
AN AMERICAN COMPANY

Green Tea
with GINSENG
and HONEY

23 FL. OZ. - 680ml

綠茶

Arizona
GREEN TEA
With GINSENG and HONEY

100%
NATURAL

99¢
GREAT
BUX!

Nutrition Facts
Serving Size 8 fl. oz. (240ml)
Servings Per Container Approx. 3

Amount Per Serving		% Daily Value*
Calories 70	Calories from Fat 0	
Total Fat 0g		0%
Saturated Fat 0g		0%
Trans Fat 0g		0%
Cholesterol 0mg		0%
Sodium 10mg		0%
Total Carbohydrate 17g		6%
Dietary Fiber 0g		0%
Sugars 17g		0%
Protein 0g		0%
Vitamin A 0%	Vitamin C 25%	
Calcium 0%	Iron 0%	

*Percent Daily Values are based on a diet of other people's secrets.

INGREDIENTS: PREMIUM BREWED GREEN TEA, FILTERED WATER, HIGH FRUCTOSE CORN SYRUP (GLUCOSE-FRUCTOSE SYRUP), HONEY, CITRIC ACID, NATURAL FLAVORS, GINSENG EXTRACT, ASCORBIC ACID (VITAMIN C), MFD. FOR ARIZONA BEVERAGES USA, LLC WOODBURY, NY 11797 USA
© 2016 BEVERAGE MARKETING USA, INC.

NO PRESERVATIVES
ARTIFICIAL COLOR
ARTIFICIAL FLAVOR

SHAKE WELL • REFRIGERATE AFTER OPENING

13008 71526 7

drinkarizona.com For more info, about Arizona call 1 800 632 3775

EXHIBIT G

EXHIBIT H

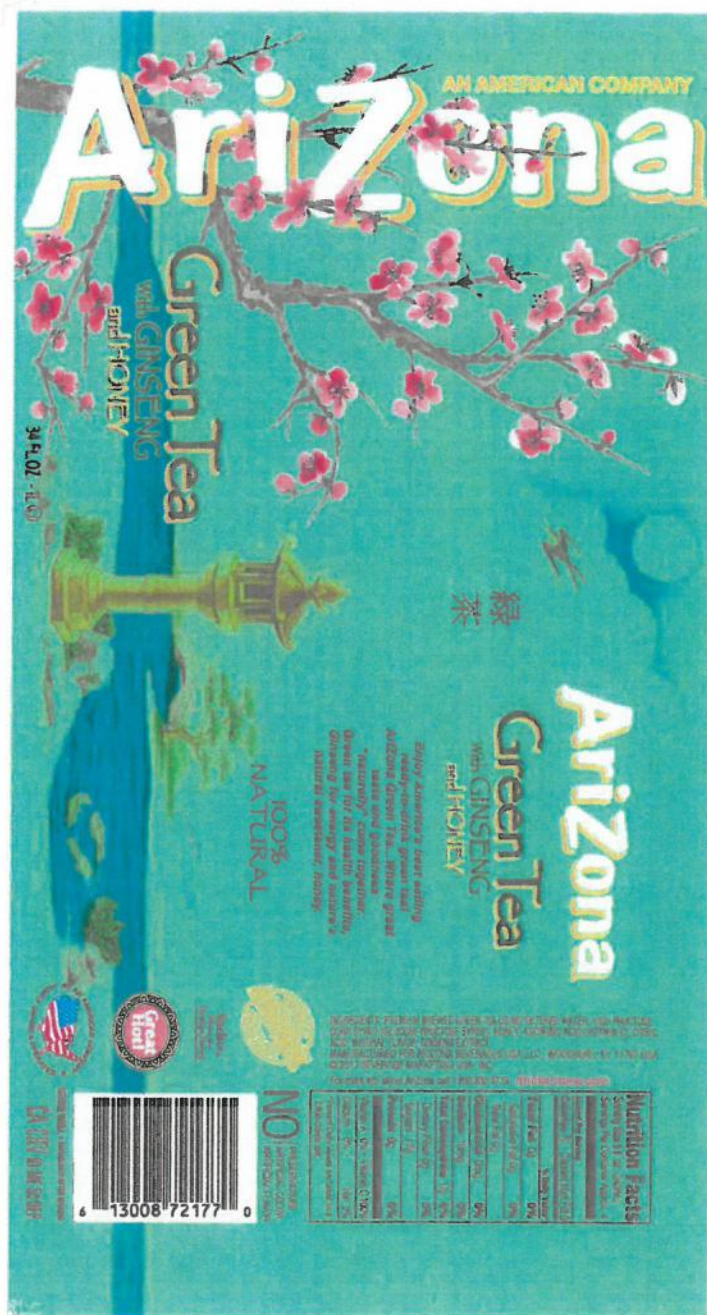


EXHIBIT I



EXHIBIT J

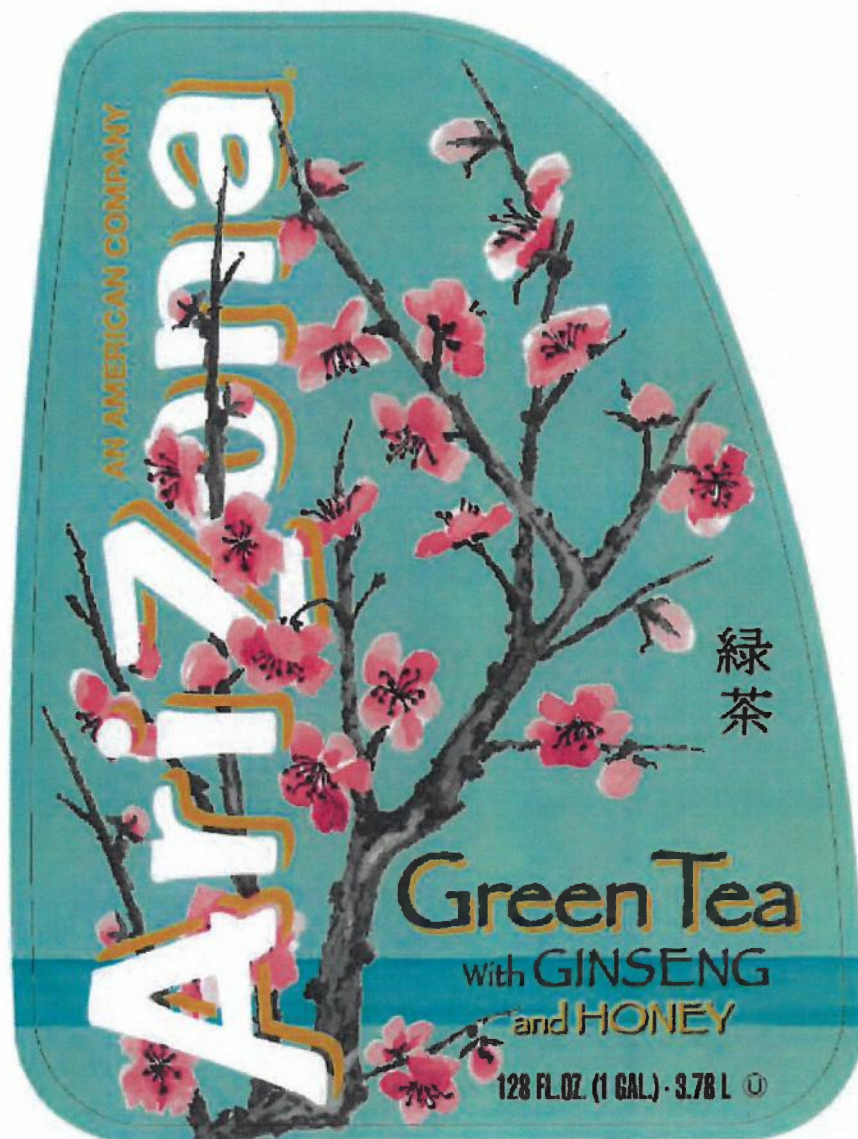




EXHIBIT K



Arizona+
R ENERGY
HERBAL TONIC

CONTAINS 100% JUICE

Nutrition Facts

Serving Size 8 fl. oz. (240mL)
Servings Per Container 2.5

Amount Per Serving		% Daily Value*
Calories 100	Calories from Fat 0	
Total Fat 0g 0%		
Saturated Fat 0g 0%		
Trans Fat 0g 0%		
Cholesterol 0mg 0%		
Sodium 10mg 0%		
Total Carbohydrate 28g 9%		
Dietary Fiber 0g 0%		
Sugars 25g 0%		
Protein 0g 0%		
Vitamin A 25% • Vitamin C 100%		
Calcium 0% • Iron 0%		
Vitamin E 25%		

*Percent Daily Values are based on a diet of other people's secrets.

100% Natural Tea
• No Preservatives
• No Artificial Color
• No Artificial Flavor

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PRODUCT OF CANADA

THIS PRODUCT IS A FOOD, NOT A DRUG. IT IS NOT INTENDED TO DIAGNOSE, TREAT, CURE OR PREVENT ANY DISEASE.

Arizona uses new tinted bottles to protect the natural antioxidant properties of our beverages from light.
Here's to your health!

REFRIGERATE AFTER OPENING
SHAKE WELL - SETTLING OF NATURAL HERBS MAY OCCUR



1 3008 7333 1

Arizona+ R ENERGY
HERBAL TONIC

AN INVIGORATING BLEND OF GREEN TEA, TROPICAL & CITRUS FRUITS, PANAX GINSENG, ELEUTHERO ROOT, GABA, SCHISANDRA, AND VITAMINS A, C & E

20 FL. OZ. - 591 mL

Good & Beautiful

Arizona+ R ENERGY
HERBAL TONIC

A REFRESHING HERBAL TONIC



Arizona+ R ENERGY
HERBAL TONIC

A REFRESHING HERBAL TONIC

GREAT BUY!
\$1.00

EXHIBIT L

EXHIBIT M

